

EXHIBIT “A”**RICO STATEMENT****QUESTION # 2**

DEFENDANT	MISCONDUCT	BASIS OF LIABILITY
Taha Jaber Al-Alwani	In his capacity as President of the International Institute of Islamic Thought and an officer of the Heritage Education Trust and Safa Trust, Al-Alwani has committed multiple acts of conspiracy to commit murder and arson, money laundering, tax fraud, Travel Act violations, filing a false tax return, and impeding and impairing the collecting of federal taxes, all in furtherance of the Enterprise’s common goals and ultimate plan of launching an attack on America.	1962(a) 1962(c) 1962(d)
Muhammad Ashraf	In his capacity as an officer and/or director of many of the SAAR Network Entities, including the Sterling Investment Group, the Sterling Charitable Gift Fund, and York Foundation, Ashraf has committed multiple acts of conspiracy to commit murder and arson, money laundering, tax fraud, Travel Act violations, filing a false tax return, and impeding and impairing the collecting of federal taxes, all in furtherance of the Enterprise’s common goals and ultimate plan of launching an attack on America.	1962(a) 1962(c) 1962(d)
M. Omar Ashraf	In his capacity as a director or officer of several of the SAAR Network Entities, including Grove Corporate, Mar-Jac Investments, and Sterling Charitable Gift Fund, Ashraf has committed multiple acts of conspiracy to commit murder and arson, money laundering, tax fraud, Travel Act violations, filing a false tax return, and impeding and impairing the collecting of federal taxes, all in furtherance of the Enterprise’s common goals and ultimate plan of launching an attack on America..	1962(a) 1962(c) 1962(d)

Yaqub Mirza	In his capacity as an officer or director of numerous of the SAAR Network Entities, including Safa Trust, Inc., SAAR Foundation, Reston Investments, Inc., Mar-Jac Investments, Inc., Grove Corporate, York Foundation, and African Muslim Agency, Mirza is the principal signatory on Safa Group checks, and has committed multiple acts of conspiracy to commit murder and arson, money laundering, tax fraud, Travel Act violations, filing a false tax return, and impeding and impairing the collecting of federal taxes, all in furtherance of the Enterprise's common goals and ultimate plan of launching an attack on America..	1962(a) 1962(c) 1962(d)
Iqbal Yunus	In his capacity as director of the Child Development Foundation, a SAAR Network Entity, and through his association with the Sterling Charitable Gift Fund and Sterling Management Group, Yunus has committed multiple acts of conspiracy to commit murder and arson, money laundering, tax fraud, Travel Act violations, filing a false tax return, and impeding and impairing the collecting of federal taxes, all in furtherance of the Enterprise's common goals and ultimate plan of launching an attack on America.	1962(a) 1962(c) 1962(d)
Ahmed Totonji	In his capacity as Chief Financial Officer and a director of numerous of the SAAR Network Entities, including, SAAR Foundation, International Institute of Islamic Thought, and Safa Trust, Totonji has committed multiple acts of conspiracy to commit murder and arson, money laundering, tax fraud, Travel Act violations, filing a false tax return, and impeding and impairing the collecting of federal taxes, all in furtherance of the Enterprise's common goals and ultimate plan of launching an attack on America.	1962(a) 1962(c) 1962(d)

Mohammed Jaghlit	In his capacity as an officer or director of numerous of the SAAR Network Entities, including, Heritage Education Trust and Safa Trust, Jaghlit has committed multiple acts of conspiracy to commit murder and arson, money laundering, tax fraud, Travel Act violations, filing a false tax return, and impeding and impairing the collecting of federal taxes, all in furtherance of the Enterprise's common goals and ultimate plan of launching an attack on America.	1962(a) 1962(c) 1962(d)
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